

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 6: UNBUNDLED LOCAL SWITCHING

- BellSouth provides both end-office switching and tandem switching on an unbundled basis.
- A CLEC can purchase unbundled switching separately from the other unbundled components needed to complete a local call. CLECs choosing unbundled switching are entitled to collect the associated interstate access charges from interexchange carriers.
- BellSouth offers switch ports and associated usage unbundled from transport, local loop transmission, and other services. Available ports include 2-wire and 4-wire line ports, 2-wire and 4-wire DID ports, 2-wire ISDN digital line side ports, 4-wire ISDN DS1 digital trunk ports, and coin ports. Additional port types may be requested under the BFR process.
- As of December 31, 1997, CLECs had in service 50 unbundled switch ports obtained from BellSouth.
- Switch ports are offered with all vertical features.
 - *Vertical features are services BellSouth offers to its retail customers, as described in state tariffs. A single vertical feature may include more than one switch capability.*
 - *Final prices for ports including vertical features will be cost-based. Any interconnection agreements that treat vertical features as retail services will be amended as necessary to reflect the Eighth Circuit's decision in Iowa Utilities Board when that decision becomes final.*
 - *Pursuant to the Bona Fide Request ("BFR") process (described in connection with Checklist Item 2), BellSouth will work with CLECs to develop features which BellSouth currently does not offer, for example by unbundling two features that currently are offered on a bundled basis. Figure 1 describes when BellSouth believes it must offer a feature requested by a CLEC and when a CLEC may use the BFR process to request features BellSouth believes it is not obligated to offer.*

FIGURE 1

Scenario	BellSouth Obligated to Provide?	BFR Required?
1. Feature currently offered to retail customers	Yes	No
2. Feature loaded and activated in switch but not a retail offering	No	Yes
3. Feature loaded in switch but not activated (requires password or RTU, etc.)	No	Yes
4. Feature not loaded in switch and requires upgrade of switch to provide	No	Yes

- No CLEC has yet used the BFR process to request any vertical features not currently offered by BellSouth.
- One CLEC claims that BellSouth refused to process its orders for 900 Number Blocking and Call Hold in Kentucky. BellSouth does not offer either of these features on a "stand-alone" basis, which is why a new arrangement had to be worked out for the CLEC. On November 3, 1997, BellSouth offered the CLEC an alternative way of providing the "stand alone" 900 Number Blocking it desired, and invited the CLEC to issue a BFR for a "stand-alone" Call Hold feature.
- The availability of selective routing capability through line class codes is governed by state commission rulings; the availability of line class codes in each central office switch is offered on a first-come, first-served basis.
- *Attachment A summarizes state arbitration orders relating to use of line class codes to perform customized routing.*
- The current capacity for line class codes (or their equivalents) for each switch type in BellSouth's network is as follows:

Lucent Technologies 1AESS:	1024
Lucent Technologies 5ESS:	4096
Nortel DMS-100 and DMS 100/200	2048
Nortel DMS-10	512
Siemens Stromberg Carlson DCO	512
Siemens EWSD	4096

- BellSouth has not denied any request for selective routing based on lack of line class code capacity.
- *While BellSouth has not developed projected potential exhaustion of line class codes, CLEC demand to date suggests there is no imminent risk of exhaustion.*
- BellSouth has developed an electronic process that enables CLECs to convert as many resale customers to customized routing as they wish per day. The CLECs need only designate which line class codes will be used for a given order.
- *Since the fall of 1997, BellSouth has been in negotiations with AT&T concerning standard processes and forms for ordering line class codes. AT&T refuses to commit to including in its orders the Selective Routing Code ("SRC"), which indicates the appropriate line class code. AT&T has included the SRC in test orders, however. BellSouth and AT&T currently are exploring use of AIN to perform selective routing.*
- *Under the AIN solution, only a very limited quantity of line class codes would be necessary. AIN therefore eliminates the exhaust concerns that have accompanied the line class code solution.*
- *AIN also allows use of the same trunk groups to accomplish selective routing for customers served by different end offices subtending a particular Hub. In contrast, the line class code solution requires a separate trunk group for each end office.*
- A technical trial of selective routing using BellSouth's AIN platform commenced in Georgia during January 1998 and is progressing as originally scheduled.
- *BellSouth's rates for selective routing are cost-based. As CLECs are not required to use customized routing to serve their customers, CLECs likely will consider factors such as expected customer demand when determining whether to use customized routing.*
- BellSouth has a technical service description and has procedures in place for ordering, provisioning, and maintaining switching services.
- Mechanized billing has been available since September 25, 1997. The mechanized billing process enables BellSouth to bill accurately for local switching, tandem switching, and shared transport. No specific billing complaints have been initiated by CLECs.

- BellSouth provides CLECs access to the Access Daily Usage File ("ADUF") pursuant to contract provisions. This service is described more fully in connection with Checklist Item 5 (unbundled local transport).
- *Since December 19, 1997, BellSouth has had the capability in a production (non-test) environment to provide CLECs with records that enable them to bill IXCs for originating and terminating access.*
- *BellSouth provides this information via the ADUF.*
- *To date, one CLEC has contracted for this capability. A first file has been provided to this CLEC for use in testing its systems. The file contained records for all the appropriate traffic originating from or terminating to unbundled ports ordered by the CLEC in a number of states. Figure 2 gives the total number of records provided to this CLEC:*

FIGURE 2

BellSouth Revenue Accounting Office (RAO)	Invoices Sent	Number of Records
44 (Miami)	1	431
48 (Kentucky)	1	136
56 (Jacksonville)	1	3
Total	3	570

- *BellSouth permits a requesting carrier to use unbundled switching to carry any type of traffic, other than intrastate exchange access, that it is authorized to carry.*
- *The carrier may provide interstate exchange access to customers for whom the carrier provides local service and collect the associated interstate access charges.*
- *BellSouth believes that charges for use of UNEs to provide intrastate access is an intrastate pricing issue reserved to the states.*
- BellSouth's times for processing orders are as follows:

Order and Provision of an Unbundled Switch Port and a Loop

Order Processing: 43 minutes for residential; 59 minutes for small business; 79 minutes for the first line of a large business order (plus 10 minutes for each additional line)

Provisioning: Ports: 3 days (1-10 ports); 4 days (11-25 ports)
 Loops: 5 days (1-5 loops); 7 days (6-14 loops)

Order and Provision of a Resale "Switch as Is"

Order Processing: 43 minutes for residential; 59 minutes for small business;
 79 minutes for the first line of a large business order (plus
 10 minutes for each additional line)

Provisioning: Same day if received by 3:00 p.m. EST; otherwise next
 business day

Order and Provision of a PIC Change:

Order Processing: 30 minutes

Provisioning: Same day if received by 3:00 p.m. EST; otherwise next
 business day

ATTACHMENT A

SUMMARY OF ARBITRATION ORDERS TO DATE:

FLORIDA: When an ALEC resells BellSouth's local exchange service, or purchases unbundled local switching, it is technically feasible to route 0+ and 0-calls to an operator other than BellSouth's, to route 411 and 555-1212 director assistance calls to an operator other than BellSouth's, or to route 611 repair calls to a repair center other than BellSouth's. BellSouth is required to provide selective routing, using the Line Class Code method, on a first-come, first-served basis.

GEORGIA: In the interim (until a permanent solution is available), it is technically feasible for BellSouth to provide ALECs with selective routing using the Line Class Code method.

TENNESSEE: Selective routing is technically feasible using the Line Class Code method. Where BellSouth customers dial 611 to access repair service, BellSouth must provide selective routing to the ALECs. Where BellSouth uses 7 digit dialing for access to repair service, ALECs should provide their own 7-digit numbers.

NORTH CAROLINA: BellSouth does not have to provide customized routing of calls for operator services and directory assistance services directly to AT&T's platform. Customized routing is not technically feasible at this time.

KENTUCKY: In those instances where branding is technically feasible it should be provided for operator services calls. However the Commission will not require BellSouth to brand directory assistance for ALECs because it does not brand its own. Where branding does take place, BellSouth shall determine the additional cost it will incur to provide it and bill ALECs for such costs. Should BellSouth initiate branding of its directory assistance, it must also offer competitors the option to have their calls branded. BellSouth understands the Kentucky PSC's Order resulting from MCI's Petition for Reconsideration and Clarification to mean that BellSouth must provide selective routing when local switching with selective routing is requested as an unbundled network element. BellSouth is not required, however, to provide selective routing when requested via total service resale provisions.

LOUISIANA: Selective routing is at present not technically feasible. BellSouth shall, within six months of this Order, show cause why it should not be ordered to provide selective routing. If, at that time, BellSouth is not providing selective routing via AIN, it shall bear the burden of so proving that there remains no technically feasible method by which to provide selective routing.

ALABAMA: Selective routing is technically feasible. BellSouth shall route AT&T's customers calling for Operator and Directory Assistance services directly to an AT&T service platform. If BellSouth chooses to use Line Class Codes to provide selective routing until a long term solution is adopted, BellSouth shall provide selective routing through the use of LCCs on first come, first served basis.

SOUTH CAROLINA: BellSouth shall route ALEC customers to the ALEC for operator and directory assistance services. Line Class Codes shall be utilized on a first come, first served basis.

MISSISSIPPI: BellSouth shall provide selective routing using Line Class Codes on an interim basis, and BellSouth shall work cooperatively to implement a long-term selective routing solution as expeditiously as possible.

**BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 7:
NONDISCRIMINATORY ACCESS TO 911, E911, DIRECTORY ASSISTANCE,
AND OPERATOR CALL COMPLETION SERVICES**

A. 911 & E911

- No change in material facts since Commission found BellSouth to be in compliance. South Carolina Order par. 225-230.
- There has been no change in BellSouth's policy regarding E-911 databases. BellSouth provides CLECs mechanized access to update the E911 databases for purposes of updating those databases. BellSouth's E911 Local Exchange Carrier Guide for Facility Based Providers gives CLECs the information they need to interconnect to BellSouth for 911 and E911 services.
- *BellSouth edits CLEC information provided about CLEC end user customers in the same manner as BellSouth data and thus confirms and verifies information in the E-911 database for CLECs.*

B. Directory Assistance

- In its approved interconnection agreements and approved or effective Statements BellSouth commits to perform directory assistance (DA) services and other number services on behalf of facilities-based CLECs.
- BellSouth's DA service is available on a nondiscriminatory basis to CLECs providing local exchange service to end user customers in exchanges served by BellSouth. CLECs can provide their end users with the same access to BellSouth's DA service as BellSouth's end users have by dialing 411 or the appropriate area code and 555-1212.
- BellSouth offers to perform DA services for CLECs, and to provide CLECs with direct access to its DA databases.
- *BellSouth offers three services to local exchange providers that will provide CLECs access to BellSouth's DA database under the same terms and conditions currently offered to other telecommunications providers: 1) Directory Assistance Access Service (DAAS), by which BellSouth currently provides DA to interexchange carriers; 2) Direct Access Directory Assistance Service (DADAS), which provides direct on-line access to BellSouth's DA database; and 3) Directory Assistance Database Service (DADS), which provides authorized BellSouth subscriber listings to CLECs wishing to provide their own Directory Assistance Service.*

- *Database information is available to CLECs in magnetic tape, cartridge tape, and the network data mover (NDM) format where the CLEC customer has connectivity.*
- *Provisions in interconnection agreements prevent BellSouth from providing other carriers certain Independent Company (ICO) and CLEC customer listings. If a CLEC or ICO is willing to waive such a clause, BellSouth will provide that CLEC'S or ICO's listings to other carriers via BellSouth's DADS and DADAS service offerings.*
- *BellSouth includes both facilities-based and reseller CLECs' subscriber listings in BellSouth's DA databases free of charge.*
 - *The CLEC must agree to cooperate with BellSouth in formulating appropriate procedures regarding lead time, timeliness, format and content of listing information.*
 - *The service order process is used to add, delete or modify listings for the DA database in the same manner and within the same intervals that BellSouth end user listings are populated in such databases.*
 - *If a listing is non-published, the database gives the name and an indicator that the number is non-published. If the customer instead requests non-list, the customer's name would not appear in the white pages directory but would be included in the database for any directory assistance operator to provide.*
 - *BellSouth Advertising & Publishing Corporation (BAPCO) publishes 510 different directory titles at an accuracy rate of 99.99 percent. Of 19,359,685 listings, there were 468 claimed errors, of which only 138 were, in fact, errors. There have been claims by CLECs of only two white page errors. BellSouth's investigation shows that BellSouth caused neither problem. Wherever BAPCO is responsible, it fixes the error and ensures it will not reoccur; if the CLEC is responsible, BAPCO provides feedback to ensure the CLEC avoids making the error in the future. A quarterly release is provided to CLECs which includes instructions on how to avoid any common CLEC errors.*
 - *The trunk group between a CLEC's switch and BellSouth's operator services platform requires that the originating call be delivered to the operator service platform over a dedicated trunk facility. Modified Operator Services Signaling (MOAA) with Expanded Inband Signaling is the standard format to be used to send the originating call to the operator services switch.*

- *BellSouth will provide selective routing to requesting CLECs' DA and Operator service platforms so that calls to that platform can be routed when a CLEC customer uses the same dialing arrangements that BellSouth customers use to access BellSouth DA and the Toll and Assistance Operator.*
- Availability of selective routing capability using line class codes is subject to state commission rulings and the availability of these codes in each central office switch and is offered on a first-come, first-served basis.
- The current capacity for line class codes (or their equivalents) for each switch type in BellSouth's network is as follows:

Lucent Technologies 1AESS:	1024
Lucent Technologies 5ESS:	4096
Nortel DMS-100 and DMS 100/200	2048
Nortel DMS-10	512
Siemens Stromberg Carlson DCO	512
Siemens EWSD	4096
- BellSouth has not denied any request for selective routing based on lack of line class code capacity.
- A technical trial of selective routing using BellSouth's AIN platform commenced in Georgia during January 1998 and is progressing as originally scheduled.
- Selective routing can be provided when a CLEC leases unbundled local switching or uses BellSouth's resold local exchange service.
- BellSouth will offer selective routing to provide branded DA services for CLEC customers.
- *In order to obtain selective routing for branding or other purposes, a CLEC must use dedicated transport between its switch and BellSouth's OS/DA platform. Without a dedicated trunk group, BellSouth's Operator Services and Directory Assistance systems cannot identify the carrier to which the call belongs.*

C. Operator Services

- *BellSouth makes available its operator services to CLECs in the same manner that it provides operator services to its own retail customers. This includes alternate billing services, person-to-person calling, dialing assistance and instructions, verification/interruption of a busy line, general assistance, operator transfer service and emergency call trace when requested by an emergency agency. Additionally, BellSouth offers Centralized Message Distribution System - Hosting (CMDS-Hosting) and Non-Sent Paid Report System (NSPRS) processing.*
- Busy Line Verification (BLV) and Busy Line Verification and Emergency Interrupt (BLVI) allow an end user to request that the operator verify that a line is busy or interrupt a conversation that is in progress.
 - *If BellSouth is the Operator Services Provider for a Facilities based CLEC, the BellSouth operator may verify lines in a CLEC switch when the CLEC orders a verification trunk group between the BellSouth operator services platform and the CLEC switch.*
 - *In the case of verification or busy line interrupt requests from customers served by BellSouth's switches, where BellSouth is not the Operator Services Provider for the CLEC, the CLEC and BellSouth may establish 2 way inward trunking. This allows the BellSouth operator to route to the CLEC operator for BLV/I of numbers residing in the CLEC switch. It also allows the CLEC operator to route to the BellSouth operator for BLV/I of numbers residing in the BellSouth switch.*
- Operator Call Processing Service provides operator and automated call handling, including processing and verification of alternative billing information for collect, calling card, and billing to a third number. Unbundled Operator Call Processing Access Service for facility-based carriers requires that originating call be delivered over a dedicated trunk facility using Modified Operator Services with Expanded Inband Signaling (MOSS).
- Operator Services Transport is used to transport calls from CLEC customers to BellSouth's operator systems. To the extent a CLEC resells BellSouth's local services or purchases unbundled local switching, the CLEC may also obtain selective routing that would allow an operator call to be routed to a BellSouth operator or to be routed to another operator services provider of the CLEC's choosing. (See above for discussion of selective routing.)

- BellSouth offers Intercept Service for calls to customers of facilities-based CLECs that is identical to the capability that is used today by BellSouth for calls among its end users. Calls to the CLEC's end users are intercepted in the event of a number change or disconnect.
- Centralized Message Distribution System (CMDS) Hosting is the Bellcore-administered national system used to exchange Exchange Message Record (EMR) formatted messages among host companies. All intraLATA and local messages originated and billed in the BellSouth region involving BellSouth CMDS hosted companies will be processed through the Non-Sent Paid Report System (NSPRS). NSPRS 1) provides information regarding non-sent paid message and revenue occurring on calls originated and billed within the BellSouth region; 2) distributes Bellcore-produced Credit Card and Third Number System (CATS) reports; and 3) distributes Bellcore-produced non-conterminous CATS reports.
- *Facilities-based CLECs can obtain access to BellSouth's operator call processing by connecting their point of interface via a trunk group to BellSouth's operator services system. As of April 1, 1998, BellSouth had provided CLECs with 452 operator services trunks and 99 verification trunks.*
- *Because methods and procedures have been in place to allow other carriers, such as independent LECs, access to BellSouth's operator call processing, such access by CLECs is considered business as usual. Accordingly, end-to-end testing was not performed for CLEC access to operator call processing.*
- Branding for operator services is provided in accordance with the state commissions' decision.

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 13: RECIPROCAL COMPENSATION

- In each state, under the supervision of the relevant state commission, BellSouth has established just and reasonable prices for reciprocal compensation such that CLECs and BellSouth receive mutual and reciprocal recovery of costs associated with the transport and termination on each carrier's facilities of local calls that originate on the network facilities of the other carrier. Recovery is based on a reasonable approximation of the additional costs of terminating calls.
- No payments are exchanged for traffic between BellSouth and CLECs that purchase UNEs. Instead, reciprocal compensation payments due from BellSouth are offset by payments due to BellSouth for the CLEC's use of UNEs to terminate traffic. Because no payments are made for this traffic, no traffic data is provided.
- Reciprocal compensation applies only to local traffic.
- When traffic other than local is routed on the same facilities as local traffic, each company will report to the other a Percentage Local Usage (PLU). A company's PLU is the factor applied to its intrastate minutes of traffic terminating on the other carrier's network. It is used to determine the amount of local minutes to be billed to the other company. *PLU is used by wireline carriers.*
- PLU is a factor: its numerator is the number of all non-intermediary local minutes of use adjusted for those minutes of use that only apply to local due to number portability. The denominator is the total number of intrastate minutes of use including local, intrastate toll, and access (adjusted for number portability), less intrastate terminating company paid minutes of use.
- *For originating and terminating wireless traffic, billing factors to allocate traffic between intra-MTA and inter-MTA jurisdictions are mutually determined by BellSouth and the mobile carrier based on network configuration, traffic studies and traffic patterns.*
 - *For intra-MTA calls that are originated on a wireless carrier's network and terminated on BellSouth's wireline network, or originated on BellSouth's wireline network and terminated on the wireless carrier's network, the local rate per the interconnection agreement would be charged.*
 - *For inter-MTA calls that are originated on a wireless carrier's network and terminated on BellSouth's wireline network, or originated on BellSouth's wireline network and terminated on the wireless carrier's network, applicable access charges would be charged.*

- Because traffic of enhanced service providers (ESPs) is not local, BellSouth does not pay or bill reciprocal compensation for ESP traffic.